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Latonia Smith*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LATONIA SMITH,

Defendant.

Case No.: 2:19-cr-00304-RFB-VCF-1

**DEFENDANT'S MOTION FOR
ADDITIONAL TIME WITH COUNSEL**

Latonia Smith, by way of her counsel, Telia Mary U. Williams, Esq., and Gwynne R. Dumbrigue Esq., respectfully request additional time with her counsel. Due to the need to be quarantined she has had less face-to-face preparation with her counsel than she ordinarily would have, barring the need for Covid precautions, in general, and with new information that has come out at her trial, as well as, new rulings, she needs to more carefully engage with her counsel on her trial strategy and to prepare for taking the stand. In particular, Ms. Smith would like to talk to counsel more carefully about the court's ruling that if she testifies as to her June 4, 2019

1 sexual assault at the hands of Government witness, Wade Beavers, that she will open the door to
2 having the Government present evidence of the BB gun during the October 31, 2019 incident.
3 Prior to her counsel's undertaking cross-examination of Mr. Beavers, where this issue was first
4 raised by the Government, she did not anticipate that her discussing her sexual assault would
5 necessarily implicate her bringing the BB gun into evidence. Had she known she might have
6 asked her counsel not to mention the sexual assault in Opening Statement. Ms. Smith spoke for
7 a couple hours with her counsel about this today, Sunday, April 25 (an attempt to talk also
8 yesterday, Saturday, April 24, with counsel failed), but it was not enough time for her to make a
9 decision on the several issues presented to her. It was also difficult on the phone to refer to
10 exhibits and precise document pages and wording, and review materials together, which would
11 greatly assist her. Furthermore, she needs to discuss new information that her counsel has
12 received from witnesses with whom counsel has met over this past weekend.
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15 Thus, Ms. Smith respectfully requests that she be permitted additional face time with her
16 counsel before she presents her case. As a proposal, she asks for Tuesday afternoon for two to
17 three (2-3) hours with counsel at the courthouse, either in the courtroom, if feasible, or in the
18 Marshal Cell Block. Having had additional time with counsel, Ms. Smith requests that she be
19 allowed to start her case on Wednesday morning, April 28. She anticipates that she would be
20 able to finish her case by no later than Thursday morning, April 29.
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22

23 Dated this 25th day of April, 2021.

24 Respectfully submitted,

25 LAW OFFICE OF TELIA U. WILLIAMS

26 /s/ Telia Mary U. Williams, Esq.

27 Telia Mary U. Williams, Esq.

28 10161 Park Run Dr., Ste. 150

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the following date the foregoing was electronically filed with the Clerk of Court using the CM/ECF system.

Dated: April 25, 2021

/s/ David DaSilva

For the Law Office of Telia U. Williams